

IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF TEXAS
SHERMAN DIVISION

UNITED STATES OF AMERICA	§	
	§	No. 4:14CR180
v.	§	Judge Crone
	§	
JAMES MICHAEL MCCULLOUGH (9)	§	

ELEMENTS OF THE OFFENSE

You are charged in Count One of the Information with a violation of 21 U.S.C.
§ 846, Conspiracy to Possess with the Intent to Distribute Methamphetamine. The
essential elements which must be proven to establish the offense are as follows:

- First: That the defendant and one or more persons, directly or indirectly,
reached an agreement to commit the crime charged in the
Information, that is, to distribute or possess with intent to distribute
methamphetamine;
- Second: That the defendant knew of the unlawful purpose of the agreement;
and
- Third: That the defendant joined in the agreement willfully, that is, with the
intent to further its unlawful purpose.

Respectfully submitted,

JOHN M. BALES
UNITED STATES ATTORNEY

/s/_____
JAY R. COMBS
Assistant United States Attorney

CERTIFICATE OF SERVICE

I hereby certify that a copy of the foregoing was filed via electronic filing to defense counsel on this the 23rd day of November, 2015.

/s/ _____
JAY R. COMBS